

manner and extent to which the Department has attempted to regulate mercury in this and other conditions throughout the draft operating permit. On January 3, 2002, the Department's Mercury Task Force released an Executive Summary and Recommendations report. The report recommended, among other things, that the Department should work, on a voluntary basis, with source operations and manufacturers to help reduce mercury in areas such as scrap metal from autos and appliances containing electrical switches, along with iron and steel smelters. The report admonished, however, that these mercury reduction recommendations were nothing more than a proposal for voluntary partnering with industry as an "interim measure until laws and regulations can be developed and implemented" related to the phase-out and/or removal of mercury in scrap, as well as regulatory development of better emission control technologies on iron and steel smelters if necessary. *See, e.g.*, NJDEP News Release "Report Outlines Impacts of Mercury in NJ and New Plan to Reduce Mercury in the Environment", dated January 3, 2002. Moreover, throughout the Mercury Task Force's report, it advises that measures to reduce mercury contamination in scrap or from industrial sources must be accomplished through a "cooperative process" given the lack of any laws or regulations in this area. Accordingly, while ASCIP is willing to work voluntarily and on a cooperative basis with the NJDEP on mercury related issues, conditions related to mercury regulation – unless specifically provided for by regulations – must be eliminated from ASCIP's draft Title V permit.

Ref #19, Page 33: The statement that ASCIP was "non-compliant" at time of permit issuance for TSP in this condition is inaccurate and should be deleted. ASCIP has passed all stack tests for TSP related to the foundry cupola.

Ref #30, Page 34: The statement that ASCIP was "non-compliant" at time of permit issuance for mercury in this condition is inaccurate and should be deleted in its entirety. ASCIP ran stack tests in March 2002 and was fully compliant for all three runs.

Ref#34, Page 35: The statement that ASCIP was “non-compliant” at time of permit issuance for CO in this condition is inaccurate and should be deleted. ASCIP has made significant and very costly upgrades to the cupola. Currently, the cupola is operating in compliance with applicable CO emission limits.

Ref #35 and 36, Page 35: The monitoring and record keeping conditions are unclear, vague and beyond the Department’s authority. Consistent with the Title V regulatory scheme, ASCIP should have the exclusive right and flexibility to maintain records in a form that best suits its operations, consistent with best management practices. Nevertheless, ASCIP would be agreeable to the language referenced in Subject Item U1 (Ref #40, Page 36) which provides that: “All records required to be kept as part of this Permit shall be entered in a permanently bound log book, or in readily accessible computer memories, or by a method acceptable to the Regional Enforcement Office, maintained on site for a minimum of five years after collection and shall be made available to representative[s] of the Department upon request.”

Ref #37, Page 35: This condition requires that the permittee “shall determine the classification of waste slag generated by the cupola” and “appropriate dispose of their waste slag.” As this condition bears no relationship to air permitting, it should be deleted in its entirety. Moreover, the referenced cite to N.J.A.C. 7:27-22.16(e) does not give the Department appropriate authority for any such requirement.

Ref #40, Page 36: As discussed above, ASCIP agrees with this condition as a reasonable means to address record keeping related requirements. To the extent any provisions in the draft Title V permit conflicts with this condition, or sets any more specific standards or requirements, such provisions should be deleted.

Ref #44, Page 37: This condition is inconsistent with ASCIP's Subchapter 8 permit, which does not regulate by flow rate. Moreover, the Department has no authority to require this condition under N.J.A.C. 7:27-22.16(e). Due to undue hardship and other operational limitations, the Department agreed, in lieu of regulating by flow rate, to the condition set forth as Ref #45, Page 37.

Ref #49, Page 38: Efficiency testing on an above charge take off cupola is not feasible, and thus is arbitrary, capricious and unreasonable. As such, this condition should be eliminated in its entirety.

Ref #47, 50 and 51, Page 38: Consistent with ASCIP's previous comments, record keeping method is improper and should be replaced with language in Ref#40, Page 36.

Ref #54, Page 39: Consistent with ASCIP's previous comments, record keeping method is improper and should be replaced with language in Ref#40, Page 36.

Ref #55 and 57, Page 39: There is no reasonable basis to regulate maximum sulfur content in these conditions. As to the waste paint, the MSDS sheets do not identify any sulfur content. Moreover, the Department has no authority to require these conditions under N.J.A.C. 7:27-22.16(e). There is also no legal or reasonable basis to require a "certificate of analysis". Such a requirement exceeds the Department's authority pursuant to N.J.A.C. 7:27-22.16(o); such a requirement would also go beyond ASCIP's Subchapter 8 permit, and thus not authorized in this Title V permit.

Ref #60, Page 40: This condition exceeds the Department's authority under N.J.A.C. 7:27-16.16(d). It also improperly exceeds the requirements in ASCIP's Subchapter 8 permit. Moreover, the record keeping requirements are vague and unclear, including, but not limited to, the requirement to "conduct an analysis." Consistent with ASCIP's previous

comments, record keeping method is improper and should be replaced with language in Ref#40, Page 36.

Ref #62, Page 40: ASCIP objects to the manner and extent to which the Department has attempted to regulate mercury in this and other conditions throughout the draft operating permit. Indeed, on January 3, 2002, the Department's Mercury Task Force released an Executive Summary and Recommendations report. The report recommended, among other things, that the Department should work, on a voluntary basis, with source operations and manufacturers to help reduce mercury in areas such as scrap metal from autos and appliances containing electrical switches, along with iron and steel smelters. The report admonished, however, that these mercury reduction recommendations were nothing more than a proposal for voluntary partnering with industry as an "interim measure until laws and regulations can be developed and implemented" related to the phase-out and/or removal of mercury in scrap, as well as regulatory development of better emission control technologies on iron and steel smelters if necessary. *See, e.g.*, NJDEP News Release "Report Outlines Impacts of Mercury in NJ and New Plan to Reduce Mercury in the Environment", dated January 3, 2002. Moreover, throughout the Mercury Task Force's report, it advises that measures to reduce mercury contamination in scrap or from industrial sources must be accomplished through a "cooperative process" given the lack of any laws or regulations in this area. Accordingly, while ASCIP is willing to work voluntarily and on a cooperative basis with the NJDEP on mercury related issues, conditions related to mercury regulation – unless specifically provided for by regulations – must be eliminated from ASCIP's draft Title V permit.

Subject Item U2 Core machines molding sand cores (OS Summary)

Ref #3 and 6, Page 41: Consistent with ASCIP's previous comments, record keeping method is improper and should be replaced with language in Ref#40, Page 36.

Subject Item U2 Core machines molding sand cores (OS 1 through OS8)

Ref #3 and 4, Pages 42 through 49: The Department has no reasonable basis or authority to set these limits and continuously monitor the make up and feed rates. The detailed chemical contents of ASCIP's raw material was estimated from MSDS sheets from the raw material at the time it submitted a pre-construction permit application. Similarly, the raw material through put is merely an estimate of the average rate. These requirements also go well beyond ASCIP's Subchapter 8 permit, and are not supported by N.J.A.C. 7:27-22.16(e). It would be arbitrary, capricious and unreasonable to include these conditions, and as such, they should be eliminated.

Subject Item U3 Melt Center Baghouse controlling launder & ladle emissions:

Ref #3, Page 51: This condition improperly limits ASCIP to 10% visible emissions. N.J.A.C. 7:27-22.16(e), which the Department cites as authority, does not impose any such limit. The Department has permitted ASCIP up to 20% opacity, consistent with other provisions contained in the draft permit. See Ref #2, Page 50. ASCIP concurs that the 20% opacity is the appropriate standard, consistent with N.J.A.C. 7:27-6.2(a). As such, the reference to 10% visible emissions should be eliminated and replaced with 20%.

Ref #19, Page 54: The reference to "efficiency" test on baghouse is inappropriate and beyond the Department's authority, and not supported by N.J.A.C. 7:27-22.16. Moreover, similar to the Department's testing protocol for mercury, the NJDEP should allow a three run "average" for all emissions, including, but not limited to, metals, CO and particulate matter, related to these conditions and other related Title V permit requirements.

Ref #21, Page 55: The statement that ASCIP was "non-compliant" at time of permit issuance for TSP emissions in this condition is inaccurate and should be deleted. ASCIP has passed all stack tests for TSP, including its most recent stack test of June 2002.

Ref #23 through 28, Pages 56 through 58: Similar to the Department's testing protocol for mercury, the NJDEP should allow a three run "average" for all emissions, including, but not limited to, metals, CO and particulate matter, related to these conditions and other related Title V permit requirements.

Ref #26, Page 57: The statement that ASCIP was "non-compliant" at time of permit issuance for lead in this condition is inaccurate and should be deleted. ASCIP has passed all stack tests for lead, including its most recent stack test of June 2002.

Ref #27, Page 57: To the extent the Department followed similar testing protocol as to mercury (*i.e.*, 3 run average), ASCIP would have been in compliance based on the data generated from its March 2002 test for chromium. Accordingly, to the extent such testing protocol is revised, the statement related to "non-compliance" should be deleted.

Ref #29 and 30, Page 58: The monitoring and record keeping requirements are unduly burdensome, arbitrary, capricious and unreasonable. Among other things: (1) it is unclear what constitutes a "batch"; (2) ASCIP would need an averaging period because actual production is dependent on casting; and (3) it is not feasible to put a continuous hour/time monitor on production. The Department also does not have authority to impose any such requirements pursuant to N.J.A.C. 7:27-22.16(o). Consistent with ASCIP's previous comments, the record keeping method is improper and should be replaced with language in Ref#40, Page 36.

U3 Melt Center Baghouse controlling launder & ladle emissions (OS1)

Ref #1, Page 59: The monitoring and record keeping requirements are unduly burdensome, arbitrary, capricious and unreasonable. Among other things, ASCIP is not aware of any strip chart that could record raw material feed rate. The Department also does not have authority to impose any such requirements pursuant to N.J.A.C. 7:27-22.16(o). Consistent with

ASCIP's previous comments, the record keeping method is improper and should be replaced with language in Ref#40, Page 36.

U3 Melt Center Baghouse controlling launder & ladle emissions (OS2, OS3, OS4, OS5, OS6, OS7, OS8, OS9, OS10)

Ref #1, Page 60; Ref #1, Page 62; Ref #2, Page 63; Ref #4, Page 64; Ref #2, Page 65; Ref #2, Page 66; Ref #2, Page 67; Ref #2, Page 68; Ref #2, Page 69: The Department has no reasonable basis or authority to set these limits. The detailed chemical contents of ASCIP's raw material was estimated from MSDS sheets from the raw material at the time it submitted a pre-construction permit application. Similarly, the raw material through put is merely an estimate of the average rate. These requirements also go well beyond ASCIP's Subchapter 8 permit, and are not supported by N.J.A.C. 7:27-22.16(e). It would be arbitrary, capricious and unreasonable to include these conditions, and as such, they should be eliminated.

Subject Item U4 Annealing Oven for Cast Pipe:

Ref #1, Page 70: This condition should be eliminated as there are no particulate matter controls on the annealing oven.

Ref #4, Page 70: This conditions should be eliminated as the raw material processing rate (150,000 lbs/hour of pipe) has no relationship to emission rates which are from combustion of natural gas. Moreover, the referenced monitoring and record keeping requirements are incomprehensible and should be deleted. Consistent with ASCIP's previous comments, record keeping method is improper and should be replaced with language in Ref#40, Page 36.

Ref #7, Page 70: To the extent that the VOC limit is based on an emission factor, it is inappropriate and beyond the Department's authority, and thus should be removed.

Moreover, this requirement is beyond ASCIP's Subchapter 8 Permit, and is unsupported by N.J.A.C. 7:27-22.16(a).

Ref #8 through 17, Pages 71 and 72: Emission rates are arbitrary, capricious and unreasonable to the extent they are based on emission factors. Moreover, this requirements go beyond ASCIP's Subchapter 8 Permit, and are unsupported by N.J.A.C. 7:27-22.16(a).

Ref #18, Page 72: This condition is duplicative, arbitrary, capricious and unreasonable, and thus should be deleted. It also is inconsistent with the allowable rate contained in Ref #23, Page 73. Moreover, this requirements go beyond ASCIP's Subchapter 8 Permit, and are unsupported by N.J.A.C. 7:27-19.13(n).

Subject Item U6 Finishing Baghouse – Cutting the pipe, grinding the bell and removal of sand:

ASCIP objects to regulation of this subject item as it exceeds the scope of requirements contained in its Subchapter 8 permits and is beyond the Department's authority.

Emission Unit/Batch Process Inventory: U1 Scrubber; U2 Core Baghouse; U3 Melt Baghouse; U4 Annealing Oven; U6 Finishing Baghouse

ASCIP objects to any and all references to "Min." (minimum) hours of operation, flow or temperature to the extent the Department intends to include such categories for purposes of permit conditions. Any such requirements would be arbitrary, capricious and unreasonable. It would also exceed the requirements of ASCIP's Subchapter 8 permit and beyond the Department's authority.

ASCIP hereby reserves its right to amend or further supplement these comments. We appreciate the Department's review of this matter, and are available to meet at the Department's convenience to discuss this matter further.

Very truly yours,

Dennis R. Charko, Vice President/General Manager
ATLANTIC STATES CAST IRON PIPE COMPANY

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Subject Item FC

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
1	General Provisions: Defines numerous terms used in N.J.A.C. 7:27. Specifies procedures for making confidentiality claims, certifying applications, reports, and other documents to the Department, and requesting adjudicatory hearings and stays of the effective date of departmental decisions. Also, provides provisions regarding applicability, severability, and liberal construction of N.J.A.C. 7:27. [N.J.A.C. 7:27-1]	None.	None.	None.
2	Control and prohibition of Open Burning: Prohibits any person from open burning of rubbish, garbage, trade waste, buildings, structures, leaves, other plant life and salvage. Open burning of infested plant life or dangerous material may only be performed with a permit from the Department. [N.J.A.C. 7:27-2]	None.	None.	Obtain an approved permit: Prior to occurrence of event (prior to open burning). [N.J.A.C. 7:27-2]
3	Prohibition of Air Pollution: Notwithstanding compliance with other subchapters of N.J.A.C. 7:27, no person shall suffer, allow, or permit to be emitted into the outdoor atmosphere substances in quantities that result in air pollution as defined at N.J.A.C. 7:27-5.1. Applicable to all facilities located in New Jersey. [N.J.A.C. 7:27-5]	None.	None.	None.

Comments or supporting explanation at bottom of each page proposed to be modified.

New Jersey Department of Environmental Protection
Facility Specific Requirements

Subject Item FC

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
4	Prevention and Control of Air Pollution Control Emergencies: Requires that written Standby Plans, consistent with good industrial practice and safe operating procedures, be prepared for reducing the emission of air contaminants during periods of an air pollution alert, warning, or emergency. [N.J.A.C. 7:27-12]	None.	None.	Comply with requirement: Upon occurrence of event. Upon proclamation by the Governor of an air pollution alert, warning, or emergency, the permittee shall put the Standby Plan into effect. In addition, the permittee shall ensure that all of the applicable emission reduction objectives of N.J.A.C. 7:27-12.4, Table I, II, and III are complied with whenever there is an air pollution alert, warning, or emergency. [N.J.A.C. 7:27-12]
5	Emission Offsets Rules. [N.J.A.C. 7:27-18]	Other: When applying for minor/significant modification, demonstrate compliance with this applicable requirement which may call for specific monitoring and/or recordkeeping activities. [N.J.A.C. 7:27-18]	Other: When applying for minor/significant modification, demonstrate compliance with this applicable requirement which may call for specific monitoring and/or recordkeeping activities. [N.J.A.C. 7:27-21]	Comply with requirement: Upon occurrence of event. Submit an administratively complete application when applying for a minor modification pursuant to N.J.A.C. 7:27-22.23 or a significant modification pursuant to N.J.A.C. 7:27-22.24. [N.J.A.C. 7:27-22]
6	Emissions Statements: Requires that an annual emission statement be submitted to the NJDEP by April 15 of each year (or by mutually agreed upon extension date, but no later than June 15 of each year) [N.J.A.C. 7:27-21]	Other: The emission statement will be based on monitoring, recording and recordkeeping of actual emissions, capture and control efficiencies, process rate and operating data for source operations with the potential to emit certain air contaminants. [N.J.A.C. 7:27-21]	Other: The emission statement and all supporting records shall be maintained on the operating premises for a period of five (5) years from the due date of each emission statement. [N.J.A.C. 7:27-21]	Submit an Annual Emission Statement: Annually by April 15 or by any mutually agreed upon extension date, but not later than June 15 of each year. [N.J.A.C. 7:27-21]
7	Compliance Certification: Submit annual compliance certification for each applicable requirement, pursuant to N.J.A.C. 7:27-22.19(f), within 60 days of the expiration of each one year anniversary from the operating permit approval date. [N.J.A.C. 7:27-22]	None.	None.	Submit an Annual Compliance Certification: Annually to the Department and EPA. [N.J.A.C. 7:27-22]
8	Prevention of Air Pollution from Architectural Coatings and Consumer Products. [N.J.A.C. 7:27-23]	None.	None.	None.
9	When using discrete emission reductions (DERs), comply with N.J.A.C. 7:27-30. [N.J.A.C. 7:27-30]	Other: See N.J.A.C. 7:27-30. [N.J.A.C. 7:27-30]	Other: See N.J.A.C. 7:27-30. [N.J.A.C. 7:27-30]	Comply with requirement: Upon occurrence of event. [N.J.A.C. 7:27-30]

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Subject Item FC

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
10	For equipment subject to NOx Budget Program, comply with N.J.A.C. 7:27-31. [N.J.A.C. 7:27-31]	Other: See N.J.A.C. 7:27-31. [N.J.A.C. 7:27-31]	Other: See N.J.A.C. 7:27-31. [N.J.A.C. 7:27-31]	Comply with requirement: Upon occurrence of event. [N.J.A.C. 7:27-31]
11	Any operation of equipment which may cause off-property effects, including odors, shall be reported to the Department to the extent required by the Air Pollution Control Act, N.J.S.A. 26:2C-19(e). [N.J.S.A. 26:2C-19(e)]	Other: Observation of plant operations. [N.J.S.A. 26:2C-19(e)]	Other: Maintain a copy of all information submitted to the Department. [N.J.S.A. 26:2C-19(e)]	Notify by phone: Upon occurrence of event. A person who causes a release of air contaminants in a quantity or concentration which poses a potential threat to public health, welfare or the environment or which might reasonably result in citizen complaints shall immediately notify the Department. Such notification shall be made by calling the Environmental Action Hotline at (877) 927-6337. [N.J.S.A. 26:2C-19(e)]
12	Prevention of Significant Deterioration (PSD). [40 CFR 52.21]	Other: When applying for minor/significant modification, demonstrate compliance with this applicable requirement which may call for specific monitoring and/or recordkeeping activities. [40 CFR 52.21]	Other: When applying for minor/significant modification, demonstrate compliance with this applicable requirement which may call for specific monitoring and/or recordkeeping activities. [40 CFR 52.21]	Comply with requirement: Upon occurrence of event. If subject to PSD, the permittee shall submit an administratively complete application when applying for a significant modification pursuant to N.J.A.C. 7:27-22.24. [N.J.A.C. 7:27-22]
13	National Emission Standards for Hazardous Air Pollutants (NESHAPS) for Asbestos. [40 CFR 61]	Other: Comply with 40 CFR 61.145 and 61.150 when conducting any renovation or demolition activities at the facility. [40 CFR 61]	Other: Comply with 40 CFR 61.145 and 61.150 when conducting any renovation or demolition activities at the facility. [40 CFR 61]	Comply with requirement: Upon occurrence of event. The permittee shall comply with 40 CFR 61.145 and 40 CFR 61.150 when conducting any renovation or demolition activities at the facility. [40 CFR 61]

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Subject Item FC

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
14	Protection of Stratospheric Ozone: 1) If the permittee manufactures, transforms, destroys, imports, or exports a Class I or Class II substance, the permittee is subject to all the requirements as specified at 40 CFR 82, Subpart A. 2) If the permittee performs a service on motor "fleet" vehicles when this service involves an ozone depleting substance refrigerant (or regulated substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified at 40 CFR 28, Subpart B. 3) The permittee shall comply with the standards for labeling of products containing or manufactured with ozone depleting substances pursuant to 40 CFR 82, Subpart E. 4) The permittee shall comply with the standards for recycling and emission reductions of Class I and Class II refrigerants or a regulated substitute substance during the service, maintenance, repair, and disposal of appliances pursuant to 40 CFR 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B. 5) The permittee shall be allowed to switch from any ozone depleting substance to any alternative that is listed in the Significant New Alternative Program (SNAP) promulgated pursuant to 40 CFR 82, Subpart G. [40 CFR 82]	Other: Comply with 40 CFR 82, Subparts A, B, E, F, and G. [40 CFR 82]	Other: Comply with 40 CFR 82, Subparts A, B, E, F, and G. [40 CFR 82]	Comply with requirement: Upon occurrence of event. The permittee shall comply with 40 CFR 82, Subparts A, B, E, F, and G. [40 CFR 82]

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Subject Item E20

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
1	No person may construct, reconstruct, install, or modify a significant source that is not covered by a permit and certificate without first obtaining a preconstruction permit. No person shall operate (nor cause to be operated) a significant source without a valid operating certificate. [N.J.A.C. 7:27-8.3(a)] AND [N.J.A.C. 7:27-8.3(b)]	Pending.	Pending.	Submittal/action pending resolution of grandfathered status of source.

Pending resolution as Atlantic States appealed, stay granted by Department and parties discussing the matter.

ATLANTIC STATES CAST IRON PIPE CO (85441)
BOP990001

Date: 1/30/2003

New Jersey Department of Environmental Protection
Facility Specific Requirements

Subject Item IS1 Sand/Cement Mixer handling

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
1	Visible emission not greater than 20% opacity exclusive of visible condensed water vapor, except for three minute period. [N.J.A.C. 7:27-6.2(e)]	None.	None.	None.

ATLANTIC STATES CAST IRON PIPE CO (85441)
BOP990001

Date: 1/30/2003

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Subject Item IS2 Sand Silo <2000 ft3 capacity storing solid articles

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
1	Visible emission not greater than 20% opacity exclusive of visible condensed water vapor, except for three minute period. [N.J.A.C. 7:27-6.2(e)]	None.	None.	None.

ATLANTIC STATES CAST IRON PIPE CO (85441)
BOP990001

Date: 1/30/2003

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Subject Item IS3 Cement Silo <2000 ft3 capacity storing solid articles

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
1	Visible emission not greater than 20% opacity exclusive of visible condensed water vapor, except for three minute period. [N.J.A.C. 7:27-6.2(e)]	None.	None.	None.

New Jersey Department of Environmental Protection
Facility Specific Requirements

Subject Item

IS4 Lime Silo <2000 ft3 capacity storing solid articles

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
1	Visible emission not greater than 20% opacity exclusive of visible condensed water vapor, except for three minute period. [N.J.A.C. 7:27-6.2(e)]	None.	None.	None.

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Subject Item IS5 Mold Sand Blasting handling <50 lb/hr.

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
1	Visible emission not greater than 20% opacity exclusive of visible condensed water vapor, except for three minute period. [N.J.A.C. 7:27-6.2(e)]	None.	None.	None.

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Subject Item IS6 Lime Slag storage <2000 cubic foot storing solid particles

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
1	Visible emission not greater than 20% opacity exclusive of visible condensed water vapor, except for three minute period. [N.J.A.C. 7:27-6.2(e)]	None.	None.	None.

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Subject Item IS7 Cupola Slag storage <2000 ft3 storing solid particles

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
1	Visible emission not greater than 20% opacity exclusive of visible condensed water vapor, except for three minute period. [N.J.A.C. 7:27-6.2(e)]	None.	None.	None.

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Subject Item

IS9 Cooling Towers handling <50 lb/hr of water treatment chemical

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
1	Visible emission not greater than 20% opacity exclusive of visible condensed water vapor, except for three minute period. [N.J.A.C. 7:27-6.2(e)]	None.	None.	None.

New Jersey Department of Environmental Protection
Facility Specific Requirements

Subject Item

IS10 Diesel Equipment <1MMBTU/hour

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
1	No visible emission except for a period of not longer than three minutes in any consecutive 30 minute period. [N.J.A.C. 7:27-3.2(a) & N.J.A.C. 7:27-3.2(c)]	None.	None.	None.
2	Maximum sulfur content in fuel oil type/viscosity and geographical zone. Sulfur content in Fuel $\leq 0.2\%$ by weight. [N>J-A>C> 7:27-9.2(b)]	Other: Sulfur content in fuel oil per supplier documentation. [N.J.A.C. 7:27-22.16(o)]	Other: Keep current copy of supplier documentation showing sulfur content. [N.J.A.C. 7:27-22.16(o)]	None.

Suppliers don't normally supply sulfur content with shipments.

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Subject Item

IS11 Parts Cleaning – unheated open top surface cleaner <6 ft2 opening with a capacity less than 100 gallons

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
1	The permittee shall cover the tank with a lid which protects the VOC vapors from drafts and diffusion during all periods which the tank is not in active use. [N.J.A.C. 7:27-16.6(a)]	Monitored by visual determination upon occurrence of event, based on an instantaneous determination. Monitoring shall occur for each period of inactive use of the tank. [N.J.A.C. 7:27-22.16(a)]	None.	None.
2	The permittee shall follow written operating, inspection, and maintenance instructions prepared in accordance with Department Guidelines when using any VOC in an open top tank or surface cleaner. [N.J.A.C. 7:27-16.6(j)]	None.	None.	None.
3	The permittee shall maintain a training program to ensure that all personnel associated with the use of operation of the open top tank or surface cleaner understand and follow the procedures specified in the Operating, Inspection, and Maintenance Instruction. [N.J.A.C. 7:27-16.6(k)]	None.	None.	None.
4	The permittee shall maintain copies of the Operating, Inspection, and Maintenance Instructions at the open top tank or surface cleaner. [N.J.A.C. 7:27-16.6(l)]	None.	None.	None.
5	Solvent must contain less than 5% by weight of any combination or methylene chloride, or perchloroethylene, 1,1,1-trichloroethane, carbon tetrachloride and chloroform. [40 CFR 63(T)]	Other: Monitored by formulation data confirmed by MSDS or other such documented specifications. [N.J.A.C. 7:27-22.16(o)]	Other: Record Keeping by maintaining a current MSDS or other such documented specifications that contain the required information. [N.J.A.C. 7:27-22.16(o)]	None.
6	The surface cleaner shall not use a cleaning solution containing 5 percent or more VOCs, HAPs, or VOC and HAP combined. [N.J.A.C. 7:27-22.16(a)]	Other: Monitored by formulation data confirmed by MSDS or other such documented specifications. [N.J.A.C. 7:27-22.16(o)]	Other: Record Keeping by maintaining a current MSDS or other such documented specifications that contain the required information. [N.J.A.C. 7:27-22.16(o)]	None.

Note Monitoring and Recordkeeping changes in No.'s 5 & 6.

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Subject Item IS14 Test Presses - handling <50 lb/hr of raw material

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
1	Visible emission not greater than 20% opacity exclusive of visible condensed water vapor, except for three minute period. [N.J.A.C. 7:27-6.2(e)]	None.	None.	None.

ATLANTIC STATES CAST IRON PIPE CO (85441)
BOP990001

Date: 1/30/2003

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Subject Item

IS16 Space Heaters - <1MMBTU/hour

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
1	No visible emission except for a period of not longer than three minutes in any consecutive 30 minute period. [N.J.A.C. 7:27-3.2(a) & N.J.A.C. 7:27-3.2(c)]	None.	None.	None.
2	Maximum sulfur content in fuel oil type/viscosity and geographical zone. Sulfur content in Fuel <=0.2% by weight. [N.J.A.C. 7:27-9.2(b)]	Other: Sulfur content in fuel oil per supplier documentation. [N.J.A.C. 7:27-22.16(o)]	Other: Keep copy of supplier documentation showing sulfur content. [N.J.A.C. 7:27-22.16(o)]	None.

Suppliers don't normally supply sulfur content with shipments.

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Subject Item IS17 Blacking Tanks – <2000 gallons capacity

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
1	Tank capacity limited to less than 2000 gallons [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
2	The tank contents shall be limited to blacking and water. [N.J.A.C. 7:27-22.16(o)]	Other: Tank Contents per Delivery. [N.J.A.C. 7:27-22.16(o)]	None.	None.

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Subject Item IS18 Welding Machines <12 lb/day of welding rod use

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
1	Visible emission not greater than 20% opacity, exclusive of visible condensed water vapor, except for three minute period. [N.J.A.C. 7:27-6.2(d) & N.J.A.C. 7:27-6.2(e)]	None.	None.	None.
2	The use of welding rod or wire is limited to 12 pounds per calendar day or less per welding machine averaged. [N.J.A.C. 7:27-22.1]	None.	None.	None.

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Subject Item IS19 Storage vessel – storing Mineral Spirits <2000 gallon capacity

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
1	The tank capacity = 1000 gallon. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
2	The tank content is limited to Mineral Spirits. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.

New Jersey Department of Environmental Protection
Facility Specific Requirements

Subject Item IS20 Storage vessel – storing petroleum Oil <10,000 gallon capacity

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
1	The tank capacity <= 10,000 gallon. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.
2	The tank content is limited to Petroleum Oils. [N.J.A.C. 7:27-22.16(a)]	None.	None.	None.

New Jersey Department of Environmental Protection
Facility Specific Requirements

Subject Item IS21 Mold Welding <50 lb/hr of raw material handling

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
1	Visible emission not greater than 20% opacity exclusive of visible condensed water vapor, except for three minute period. [N.J.A.C. 7:27-6.2(d) & N.J.A.C. 7:27-6.2(e)]	None.	None.	None.

New Jersey Department of Environmental Protection
Facility Specific Requirements

Subject Item PT1 Cupola Scrubber Stack

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
1	<p>Conduct a comprehensive stack test to demonstrate compliance with permit limits. The test shall be conducted to verify emission limits as follows: TSP, PM-10, Arsenic, Chromium, Lead, Mercury, Cadmium, Nickel, VOC, NOX and SO2 emission limits.</p> <p>Tests shall be conducted once initially and every five years. The Department reserves the right to request stack tests within the five year period as a result of violations or complaints. The Department may request a stack test for benzene and polycyclic organic matter at the same five year interval.</p> <p>When performing the stack emission test, the source shall operate within +/- 5% of the maximum rate achieved during the stack test up to 75 tons per hour. The maximum load shall include alternative fuels approved to be burned as part of the permit (i.e. waste oil, waste paint & wood pallets) during at least one run of testing. During this run the maximum hourly load of alternative fuels shall be burned. [N.J.A.C. 7:27-22.16(a)]</p>	<p>Other: Stack emission tests, based on sixty minute periods or alternate periods approved by the Department. [N.J.A.C. 7:27-22.16(a)]</p>	<p>Other: Recording shall be done through stack test reports. Submit the stack test results within 45 days after completing the stack test. [N.J.A.C. 7:27-22.18(e)] The department may approve an extension for the stack test results submittal. [N.J.A.C. 7:27-22.19(d)]</p>	<p>Stack Test: Submit protocol, conduct test and submit results as per the approved schedule. A protocol to conduct a stack test must be submitted to the Bureau of Technical Services (BTS), at PO Box 437, Trenton, NJ 08625-0437 within 90 days of the operating permit approval. Within 30 days of protocol approval, the permittee must schedule a mutually acceptable test date with BTS at 609-530-4041. The stack test must be conducted within 180 days from the date of the approved permit. The stack test report must be submitted within 45 days after performing the stack test. The department may approve an extension for the stack test results submittal. [N.J.A.C. 7:27-22.19(d)] The test results must be certified by a New Jersey licensed professional engineer or certified industrial hygienist. [N.J.A.C. 7:27-22.18(e)]</p>

Under applicable requirement is conducting a stack test within +/- 5% of 75 tons per hour acceptable? Suggest language that limits iron charged to +/- 5% of the maximum rate achieved during the stack test until another stack test is completed at a higher maximum load. Otherwise could be considered in violation.

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Subject Item PT1 Cupola Scrubber Stack

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submission/Action Requirement
2	Mercury Emission limit <=.038 lb/hr. [N.J.A.C. 7:27.16(E)]	Other: Stack testing for mercury shall be conducted once every five years. If any of the stack tests for mercury exceed the emission limit, then the testing for mercury will revert to quarterly tests. Upon demonstrating compliance with the quarterly testing requirement for four consecutive quarters, mercury stack tests shall revert back to the five year interval. Mercury tests shall be performed utilizing EPA Method 29 or an alternative approved by the Bureau of Technical Services. Each test shall consist of the average of three runs. [N.J.A.C. 7:27-22.16(o)]	If required, recordkeeping by stack test results for mercury quarterly; once per quarter, quarters shall begin on January 1, April 1, July 1, and October 1 of each year. [N.J.A.C. 7:27-22.16(o)]	If required, submit a stack test report. Every April 30, July 30, October 30, and January 30 for the preceding quarter year (the quarter years begin on January 1, April 1, July 1, and October 1). Stack Test - Submit protocol, conduct test, and submit results: An initial stack test protocol shall be submitted to the Bureau of Technical Services (BTS) within 90 days from the approval date of the operating permit. Within 30 days of protocol approval, the permittee must contact BTS at 609-530-4041 to schedule a mutually acceptable test date. Quarterly tests shall begin no later than 180 days after the approval of the operating permit. Stack test results shall be submitted within 45 days from the completion date of the stack test. [N.J.A.C. 7:27-22.16(o)] The department may approve an extension for the stack test results submittal. [N.J.A.C. 7:27-22.19(d)]

Possible acceptable language for mercury requirements. The last stack test date for mercury was March, 2002 which demonstrated compliance during all three test runs.

New Jersey Department of Environmental Protection
Facility Specific Requirements

Subject Item PT3 Melt Center Emission Control Stack

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
1	Conduct a comprehensive stack test to demonstrate compliance with TSP (99% particulate control efficiency), PM-10, CO, NOX, Pb, SOx, VOC Chromium Compounds and Nickel Compounds emission limits. Tests shall be conducted for each contaminant while the melt center is operating within +/- 5% of maximum load. [N.J.A.C. 7:27-22.16(a)]	Monitored by stack emission testing every 5 years, based on any 60 minute period. Stack test 180 days prior to submittal of the Operating Permit renewal application. [N.J.A.C. 7:27-22.16(o)]	Other: Stack Test Report – All stack test results shall be recorded and reported in units of lb/hr and gaseous emissions (VOC, NOx, SOx and CO) shall be reported as ppmv, dry. [N.J.A.C. 7:27-22.18(e)]	Stack Test – Submit protocol, conduct test and submit results: As per the approved schedule, a protocol to conduct stack test shall be submitted to the Bureau of Technical Services (BTS), at PO Box 437, Trenton, NJ 08625-0437, within 90 days after receiving approval of the operating permit. Upon protocol approval, the applicant must schedule a mutually acceptable test date with BTS. The stack test must be performed within 180 days after the permit approval date. The stack test report must be submitted within 45 days after performing the stack test. The test results must be certified by a New Jersey licensed professional engineer or certified industrial hygienist. [N.J.A.C. 7:27-22.18(e)] The department may approve an extension for the stack test results submittal. [N.J.A.C. 7:27-22.19(d)]

Note Submittal/Action Requirement changes.

New Jersey Department of Environmental Protection
Facility Specific Requirements

Subject Item U1 Scrubber system controlling emissions from foundry cupola
Operating Scenario: OS Summary

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
1	Maximum allowable particulate emission rate based on 99% collection efficiency = 21 lb/hr. [N.J.A.C. 7:27-6.2(a)]	None.	None.	None.
2	Opacity <= 20% except for emissions which are greater than 20% opacity, exclusive of water vapor, for a period of not longer than three (3) minutes in any consecutive 30 minute period. [N.J.A.C. 7:27-6.2(e)]	None.	None.	None.
3	Maximum sulfur content of coke <= 0.6% by wt. [N.J.A.C. 7:27-10.2(b)]	Other: Sulfur content in fuel. Per delivery. [N.J.A.C. 7:27-22.16(o)]	Other: Keep certificate of analysis from the fuel supplier showing fuel sulfur content. [N.J.A.C. 7:27-22.16(o)]	None.
4	From the NOx control plan, the emission rates of nitrogen oxides from the Cupola shall not exceed 0.188 lb/MMBTU.	Other: Stack emission testing once initially and every 5 years prior to Operating permit renewal application. (See subject item PTI for details) [N.J.A.C. 7:27-22.16(o)]	Other: Stack emission testing once initially and every 5 years prior to Operating permit renewal application. [N.J.A.C. 7:27-22.16(o)]	Stack Test - Submit protocol, conduct test, and submit results: As per the approved schedule prior to Operating Permit renewal application. (See subject item PTI for details) [N.J.A.C. 7:27-22.16(o)]

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Subject Item U1 Scrubber system controlling emissions from foundry cupola
Operating Scenario: OS Summary

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
5	The permittee shall not use the equipment in a manner which will cause visible emissions to exceed 10%, except for a period of 30 minutes during startup and shutdown when opacity shall not exceed 20%, exclusive of condensed water vapor. [N.J.A.C. 7:27-22.16(e)]	Monitored by visual determination daily, based on an instantaneous determination for compliance with the monitoring and recordkeeping requirements for the opacity standard, the permittee shall conduct visual opacity inspections during daylight hours. Visual inspections shall consist of a visual survey to identify if the stack has visible emissions, (other than condensed water vapor), greater than the prescribed standard. If visible emissions are observed, the permittee shall do the following: (1) Verify that the equipment and/or control device causing the emission is operating according to the manufacturer's specifications and the operating permit compliance plan. If the equipment or control device is not operating properly, the permittee shall take corrective action immediately to eliminate the excess emissions. The permittee must report any permit violation to NJDEP pursuant to N.J.A.C. 7:27-22.19. (2) If the corrective action taken in step one does not correct the opacity problem within 24 hours, the permittee shall perform a check via a certified opacity reader, in accordance with N.J.A.C. 7:27B-2. Such a test shall be conducted once per day until corrective action is taken to successfully correct the opacity problem. The permittee must report any continuing permit violation to NJDEP pursuant to [N.J.A.C. 7:27-22.19] and [N.J.A.C. 7:27-22.16(o)]	Recordkeeping by manual logging of parameter daily. The permittee must retain the following records: (1) Date and time of inspection; (2) Emission point number; (3) Operational status of equipment; (4) Observed results and conclusions; (5) Description of corrective action taken if needed; (6) Date and time opacity problem was solved, if applicable; and (7) Name of person(s) conducting inspection. [N.J.A.C. 7:27-22.16(o)]	None.
6	Maximum annual emission rate from preconstruction permit TSP <= 37.8 tons/yr. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Subject Item U1 Scrubber system controlling emissions from foundry cupola
Operating Scenario: OS Summary

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
7	Maximum annual emission rate from preconstruction permit. PM-10 (total) = 37.8 tons/year. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
8	Maximum annual emission rate from preconstruction permit. Carbon Monoxide <= 756 tons/year. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
9	Maximum annual emission rate from preconstruction permit. SO2 <= 4.95 tons/year. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
10	Maximum annual emission rate from preconstruction permit. Nitrogen Oxides <= 50.4 tons/year. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
11	Maximum annual emission rate from preconstruction permit. VOC (total) <= 21.6 tons/year. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
12	Maximum annual emission rate from preconstruction permit. HAPs (total) <= 2.8 tons/year. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
13	Maximum annual emission rate from preconstruction permit. Arsenic emissions <= 0.001 tons/year. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
14	Maximum annual emission rate from preconstruction permit. Cadmium emissions <= 0.08 tons/year. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
15	Maximum annual emission rate from preconstruction permit. Chromium emissions <= 0.011 tons/year. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
16	Maximum annual emission rate from preconstruction permit. Lead emissions <= 2.6 tons/year. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Subject Item U1 Scrubber system controlling emissions from foundry cupola
Operating Scenario: OS Summary

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
17	Maximum annual emission rate from preconstruction permit. Mercury emissions <= 136 lb/year. [N.J.A.C. 7:27-22.16(e)]	Other: Calculate annual emissions based on the annual scrap usage and the average lb/ton emission factor. The emission factor shall be calculated base on the mercury stack tests and the amount of scrap used during the tests. [N.J.A.C.7:27-22.16(o)]	Other: Record lb/year emissions annually. [N.J.A.C.7:27-22.16(o)]	Other: Submit an annual report including annual mercury emissions coincident with the Annual Emission Statement of each calendar year to the Regional Enforcement Office and the Bureau of Air Quality Evaluation. [N.J.A.C.7:27-22.16(o)]
18	Maximum annual emission rate from preconstruction permit. Nickel Emissions <= 0.0027 tons/year. [N.J.A.C. 7:27-22.16(e)]	None.	None.	None.
19	Maximum emission rate from preconstruction permit. TSP <= 21 lb/hr. [N.J.A.C. 7:27-22.16(e)]	Other: Stack emission testing - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)] Source presently in compliance but enforcement action on alleged prior violation is pending resolution.	Other: Stack test results - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]	Other: Submit a stack test report - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]
20	Maximum emission rate from preconstruction permit. PM-10 (total) <= 21 lb/hr. [N.J.A.C. 7:27-22.16(e)]	Other: Stack emission testing - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)] Source presently in compliance but enforcement action on alleged prior violation is pending resolution.	Other: Stack test results - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]	Other: Submit a stack test report - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]
21	Maximum emission rate from preconstruction permit. Carbon Monoxide <= 420 lb/hr. [N.J.A.C. 7:27-22.16(e)]	Other: Stack emission testing - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]	Other: Stack test results - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]	Other: Submit a stack test report - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]
22	Maximum emission rate from preconstruction permit. SO2 <= 2.75 lb/hr. [N.J.A.C. 7:27-22.16(e)]	Other: Stack emission testing - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]	Other: Stack test results - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]	Other: Submit a stack test report - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]
23	Maximum emission rate from preconstruction permit. Nitrogen Oxide <= 28 lb/hr. [N.J.A.C. 7:27-22.16(e)]	Other: Stack emission testing - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]	Other: Stack test results - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]	Other: Submit a stack test report - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]

Katherine Hunt indicated that some modified language might be appropriate. Suggest: "Source presently in compliance but enforcement action on alleged prior violation is pending resolution".

**New Jersey Department of Environmental Protection
Facility Specific Requirements**

Subject Item U1 Scrubber system controlling emissions from foundry cupola
Operating Scenario: OS Summary

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
24	Maximum emission rate from preconstruction permit. VOC (total) <= 12 lb/hr. [N.J.A.C. 7:27-22.16(e)]	Other: Stack emission testing - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]	Other: Stack test results - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]	Other: Submit a stack test report - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]
25	Maximum emission rate from preconstruction permit. HAPs (total) <= 1.53 lb/hr. [N.J.A.C. 7:27-22.16(e)]	Other: Stack emission testing - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]	Other: Stack test results - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]	Other: Submit a stack test report - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]
26	Maximum emission rate from preconstruction permit. Arsenic emissions <= .00058 lb/hr. [N.J.A.C. 7:27-22.16(e)]	Other: Stack emission testing - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]	Other: Stack test results - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]	Other: Submit a stack test report - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]
27	Maximum emission rate from preconstruction permit. Cadmium emissions <= 0.044 lb/hr. [N.J.A.C. 7:27-22.16(e)]	Other: Stack emission testing - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]	Other: Stack test results - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]	Other: Submit a stack test report - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]
28	Maximum emission rate from preconstruction permit. Chromium emissions <= 0.0063 lb/hr. [N.J.A.C. 7:27-22.16(e)]	Other: Stack emission testing - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]	Other: Stack test results - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]	Other: Submit a stack test report - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]
29	Maximum emission rate from preconstruction permit. Lead emissions <= 1.44 lb/hr. [N.J.A.C. 7:27-22.16(e)]	Other: Stack emission testing - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]	Other: Stack test results - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]	Other: Submit a stack test report - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]
30	Maximum emission rate from preconstruction permit. Mercury emissions <= 0.038 lb/hr. [N.J.A.C. 7:27-22.16(e)]	Other: Stack emission testing - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)] Source presently in compliance but enforcement action on alleged prior violation is pending resolution.	Other: Stack test results - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]	Other: Submit a stack test report - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]
31	Maximum emission rate from preconstruction permit. Nickel emissions <= 0.0015 lb/hr. [N.J.A.C. 7:27-22.16(e)]	Other: Stack emission testing - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]	Other: Stack test results - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]	Other: Submit a stack test report - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]
32	Conduct comprehensive stack test once initially and every five years prior to submitting the Operating permit renewal application. [N.J.A.C. 7:27-22.16(o)]	Other: Stack emission testing - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]	Other: Stack test results - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]	Other: Submit a stack test report - See Subject Item PT1 for details. [N.J.A.C. 7:27-22.16(e)]

Katherine Hunt indicated that some modified language might be appropriate. Suggest: "Source presently in compliance but enforcement action on alleged prior violation is pending resolution".

New Jersey Department of Environmental Protection
Facility Specific Requirements

Subject Item U1 Scrubber system controlling emissions from foundry cupola
Operating Scenario: OS Summary

Ref. #	Applicable Requirement	Monitoring Requirement	Record Keeping Requirement	Submittal/Action Requirement
33	Total production rate (maximum metallic charge to Cupola) <= 270,000 tons/year. [N.J.A.C. 7:27-22.16(e)]	Other: Monitor total charge rate per production day. [N.J.A.C. 7:27-22.16(e)]	Other: Manual logging or electronic data storage of charge rate once per production day. [N.J.A.C. 7:27-22.16(e)]	None.
34	Carbon Monoxide <= 2,500 ppmvd (maximum daily average. The maximum daily average may exceed 2500 ppmvd up to three (3) days each quarter but shall never exceed 4,000 ppmvd. If the daily average CO concentration does not exceed 2500 ppmvd for four (4) consecutive quarters, the permittee shall comply with the 2500 ppmvd daily average limit at all times from preconstruction permit. [N.J.A.C. 7:27-22.16(e)]	Monitored by continuous emission monitor continuously, based on any 60 minute period (averaged daily). The permittee shall also operate an oxygen continuous emission monitor. [N.J.A.C. 7:27-22.16(e)] Source presently in compliance but enforcement action on alleged prior violation is pending resolution.	Recordkeeping by data acquisition system (DAS)/electronic data storage continuously. [N.J.A.C. 7:27-22.16(e)]	None.
35	The maximum total load of metals to the Cupola from preconstruction permit <= 75 tons/hour. [N.J.A.C. 7:27-22.16(e)]	Monitored by gravimetric monitoring once per charge during operation. [N.J.A.C. 7:27-22.16(e)]	Recordkeeping by manual logging or electronic data storage once per production day.	None.
36	The maximum amount of coke to be burned in the Cupola from preconstruction permit. Coke <= 20,000 tons/year. [N.J.A.C. 7:27-22.16(e)]	Monitored by gravimetric monitoring once per charge during operation. [N.J.A.C. 7:27-22.16(e)]	Recordkeeping by manual logging or electronic data storage once per production day.	None.
37	The permittee shall submit a quarterly report on the Excess Emissions and Monitoring Performance Report from (EEMR), available from the Regional Enforcement Office, within 30 days of the close of each quarter, to the Regional Enforcement Office. [N.J.A.C. 7:27-22.16(e)]	None.	None.	As per the approved schedule, the report shall be submitted within 30 days of the close of the quarter: Every April 30, July 30, October 30, and January 30 for the preceding quarter year. The quarter years begin on January 1, April 1, July 1 and October 1. When no excess emissions have occurred or the continuous monitoring systems have not been operative, repaired, or adjusted, such information shall be stated on the report. [N.J.A.C. 7:27-22.16(e)]

Katherine Hunt indicated that some modified language might be appropriate. Suggest: "Source presently in compliance but enforcement action on alleged prior violation is pending resolution".